

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

December 2, 2024

BY ECF

The Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 112011

Re: U.S. v. Carlos Watson and Ozy Media, Inc.

Ms. Frison and I today are filing a joint sentencing memorandum on behalf of our respective clients. With the Court's permission, we will advise the Court by December 11, 2024, whether anyone may seek permission to speak at sentencing on behalf of Mr. Watson and OZY Media, Inc.

Upon consultation, the government consents to an extension of time until December 4, 2024, within which Mr. Watson and OZY may address the issue of forfeiture. We respectfully request that the Court permit this extension of time as more time is needed for the Defendants to work through forfeiture-related issues.

Upon further consultation with the government, the Defendants further confirmed their understanding that restitution need not be addressed in today's submission, especially as the defense has had difficulty accessing information relating to restitution provided by the government last week via USAFX, and as the law permits resolution of restitution even after sentencing.

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

While it is too early to know whether resolution of restitution will necessitate extra time after sentencing, we note the parties' understanding that it need not be addressed immediately in case such understanding does not square with the Court's expectations.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Sullivan Jr.', with a stylized flourish at the end.

Ronald S. Sullivan Jr.

cc: all counsel of record